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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOE DIVISION

11 BERTRAM CHAN AND MARIE CHAN,) Case No. CV-15-3251 BLF
12)
13 Plaintiffs,)
14 v.) STIPULATION AND ~~proposed~~ ORDER
15 UNITED STATES OF AMERICA,) ENLARGING TIME FOR THE UNITED STATES
16 Defendant.) TO ANSWER AND CONTINUING THE
17) INITIAL CASE MANAGEMENT CONFERENCE

18 For the reasons (1) that the United States just became aware today that Plaintiffs completed
19 service on the United States providing this Court with personal jurisdiction of the United States in this
20 matter; (2) that the United States Attorney has not received the administrative file necessary to file an
21 answer or other defense to this matter with knowledge and information; (3) that counsel for the Plaintiffs
22 just became aware today of the Thursday December 10, 2016 case management conference; (4) that the
23 parties did not file the required Joint Case Management Statement on December 3, 2015, and (5)
24 because of the complex nature of this matter, additional time is necessary to allow the United States
25 adequate time to prepare and file its answer and for both the Plaintiffs and the United States to prepare
26 and file the Joint Case Management Statement;

27
28 Stipulation & [proposed] Order
Enlarging Time to Answer and
Continuing Case Management Conference
No. CV-15-3251 BLF

1 It is hereby stipulated by and between Plaintiffs and Defendant United States of America,
2 through their respective counsel as follows

- 3 1. That the time for the United States to file its answer or other defense to this suit be enlarged
4 to January 6, 2016;
5 2. That the Joint Case Management Conference Statement be filed on January 7, 2016; and
6 3. That the Case Management Conference be held on January 14, 2016 at 11:00 a.m.

7 Respectfully Submitted,

8 BRAIN J. STRETCH
9 Acting United States Attorney

10 _____/s/_____
11 TROY RENKEMEYER
12 Attorney for Plaintiffs
13 Bertram Chan and Marie Chan

10 _____/s/_____
11 THOMAS MOORE
12 Assistant United States Attorney
13 Chief, Tax Division

14
15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16
17 Dated: _____

17 
18 _____
19 UNITED STATES DISTRICT JUDGE